

2.A TOPICAL RESPONSES TO COMMENTS

TR-1 TRAFFIC

A number of comments received on the Draft EIR focused on Project-related traffic impacts. Areas of concern that were cited include the following: 1) existing condition traffic counts, 2) construction-related traffic impacts, 3) Project trip generation, 4) operational intersection impacts; 5) Project Site access, and 6) mitigation measures for potentially significant impacts.

The Draft EIR evaluated potential impacts related to traffic, circulation, access, public transit, and alternative (non-vehicular) transportation in Section 4.K, Transportation and Parking, with supporting data provided in the Project Traffic Impact Analysis (TIA) and associated studies and correspondence included in Appendix I-1, Traffic Impact Analysis, of the Draft EIR.

1. EXISTING CONDITION TRAFFIC COUNTS

There are several major roadway improvement and construction public works projects in the immediate Project vicinity and in the larger traffic study area which have temporarily disrupted local circulation in recent years. The most disruptive of these is the three-year-long Alameda Corridor-East Construction Authority (ACE) Nogales Street Grade Separation Project, which was undertaken in 2013 and is currently under construction approximately one-half mile east of the Project Site. As stated in Section 4.K of the Draft EIR, as part of this project, Gale Avenue is being widened by 16 and 18 feet along the Project Site frontage and to the east and west and the Gale Avenue eastbound approach to Nogales Street is being reconfigured to provide additional turn lanes. Since 2013, however, related construction, including a detour road and construction staging and parking on the Project Site, of the New Charlie Road detour between Railroad Avenue and Gale Avenue, necessitated by the temporary closure of Railroad Avenue at Nogales Street, has considerably modified local traffic circulation and increased congestion in the area. The Nogales Street Grade Separation Project has also necessitated, in addition to construction at the site of the underpass being built, utility relocation within an approximately two-square-mile area surrounding the underpass location that includes above-ground and underground electricity, telecommunications, and water transmission and distribution lines and a substation, further adversely affecting traffic in the area.

Traffic counts used to define existing conditions in the Project's study area for the purposes of the TIA and EIR preparation were conducted prior to the beginning of construction related to the Nogales Street Grade Separation project to document normal or "typical" circumstances, prior to the atypical circumstances created by the Grade Separation project's short-term construction-related disruption. Traffic conditions in the Project vicinity have therefore been atypical and subject to ongoing changes throughout the construction phases of the Nogales Street Grade Separation Project, and would not have provided a typical or accurate baseline against which to measure the Project's potential near-term impacts.

Additional ongoing improvements in the study area include a funded highway improvement project that would add a northbound exclusive right-turn lane to Fullerton Road at Colima Road (Intersection No. 4), which is currently being administered by LACDPW.

These projects are nearing completion and, once completed, congestion in the area is expected to considerably improve, including the levels of service (LOS) at the intersections nearest the Project Site, in comparison to the current (temporary) conditions caused by construction, and in comparison to conditions at the time counts were conducted, as those predated the Nogales Street Grade Separation, which will remove traffic delays and congestion caused by the former at-grade train crossing on Nogales Street. The proposed Rowland Heights Plaza and Hotel Project would not commence operation until the Nogales Street Grade Separation Project underpass and Gale Avenue widening along the Project Site frontage has been completed and the related temporary detour road and construction staging currently located on the Project Site have been removed.

The Project TIA is based on traffic volume data collected (i.e., counts conducted at study area intersections) in April 2013, before the start of construction of ACE Nogales Street Grade Separation Project. The study area and associated intersections evaluated in the TIA and EIR were agreed upon during early consultation with the Los Angeles County Department of Public Works, Traffic and Lighting Division (LACDPW Traffic and Lighting) and the California Department of Transportation (CALTRANS), before counts were conducted or analysis prepared.

2. PROJECT TRIP GENERATION

The Project's gross (unadjusted) trip generation was calculated based on rates contained in the Institute of Transportation Engineers (ITE) *Trip Generation Manual*, 9th Edition, which represents the nationally-accepted authoritative source of this information in the traffic engineering field. LACDPW Traffic and Lighting and CALTRANS approved the Project trip generation and trip distribution assumptions before Project analysis was conducted. Trip generation rates determined to be applicable to the Project included those for Shopping Center, High-Turnover Sit-Down Restaurant, Quality Restaurant, Hotel, and Office land uses, to ensure each proposed Project land use was accounted for independently.

Net trip generation was then calculated, as set forth in Table 4.K-4 on page 4.K-24 of Section 4.K of the Draft EIR, by determining the allowable reductions recommended by LACDPW Traffic and Lighting in Project trips associated with so-called pass-by trips (the percentage of Project trips otherwise already passing the Project Site route to other places) and internal capture (reflecting the use of collocated on-site commercial and restaurant uses by hotel and commercial employees and patrons already on the Project Site, and therefore not generating net new trips to the Project Site from off-site points of origin). No modal split (reductions for transit use) was applied to the gross trip generation, to ensure a conservative projection.

Since the Draft EIR was circulated, several minor modifications to the Project have been made, as set forth in Chapter 3.0, Corrections & Additions, of this Final EIR. The number of guestrooms in Hotel A on Parcel 2 has been reduced from 275 to 270. Additionally, within the Commercial Center on Parcel 1, while the net square footage of proposed office space (2,000 s.f.) has not changed and Parcel 1 net square footage remains unchanged at 129,926 s.f., the relative proportions of retail, restaurant, and office space that comprise that total have been adjusted to reflect the gross square footage of proposed office space (6,000 s.f.), and trip generation has been conservatively recalculated to reflect this. Overall, Project trip generation has been slightly reduced as a result of these minor modifications; recalculated trip generation is provided in Appendix A of this Final EIR. These Project modifications do not change any of the significance findings presented in the Draft EIR.

3. CONSTRUCTION IMPACTS

Traffic impacts during construction would be minimized by restricting construction employee and delivery traffic and from entering or exiting the Project Site during the hours of 7:00 A.M. to 9:00 P.M. and 4:00 P.M. to 6:00 P.M., and the easternmost driveway, shared with the adjacent Rowland Heights Plaza Shopping Center, which includes the Rowland Heights Plaza/Ranch Market and restaurants, would not be used during construction except when necessary for reasons of access and maneuvering. Oversized-transport is not anticipated to be required for the construction of the Project. If oversized-transport is required, a transportation permit would be obtained from the California Department of Transportation. Lane closures or street detours are not anticipated to be required for the construction of the Project. If lane closures or street detours are required, the Project Applicant would coordinate with the California Department of Transportation and LACDPW Traffic and Lighting.

4. INTERSECTION IMPACTS

There are different levels of screening for potential Project impacts on an intersection. The first screening criteria requires a determination that a proposed project is likely to contribute a measurable amount of traffic to an intersection; if this is anticipated, that intersection is required to be analyzed in the TIA. Then, analysis is conducted to determine whether a project is likely to contribute significant traffic to an intersection, potentially causing a potential impact. Finally, a determination is made as to whether a project would contribute significant amounts of traffic to an intersection, causing an impact such that the intersection is projected to operate at an unacceptable Level of Service.

Based on the Project TIA, the Project would potentially significantly impact five intersections under Future (2020) With Project Plus Cumulative Conditions: Fullerton Road/Gale Avenue, Fullerton Road/SR-60 EB Ramps, Fullerton Road/Colima Road, Nogales Street/La Puente Road, Nogales Street/San Jose Avenue, Nogales Street/Gale Avenue, and Nogales Street/Colima Road. Mitigation would reduce impacts at two of these intersections to less than significant levels, whereas mitigation was determined by the County not to be feasible at the remaining three intersections and impacts at those intersections would be significant and unavoidable. However, following completion of the roadway improvements currently being implemented in the study area and implementation of the required Project improvements as described in the TIA and Section 4.K of the Draft EIR, despite these Project impacts, all study area intersections are projected to operate within acceptable Levels of Service in the future during Project operations.

5. PROJECT EAST ACCESS DRIVEWAY – SHARED ACCESS

The ACE Construction Authority is currently constructing the Nogales Street Grade Separation Project, which commenced in 2013 and is scheduled to be completed in 2016. Nogales Street is currently closed between Gale Avenue and San Jose Avenue for construction of a roadway underpass, and traffic patterns in the area are temporarily altered because of the construction and related utility and infrastructure improvements within a two-mile radius of the underpass. For this reason, baseline traffic counts within the area were conducted in April 2013, before the Nogales Street Grade Separation Project began, at the request of the Los Angeles County Department of Public Works. Those baseline traffic counts define the normal travel patterns before the Nogales Street Grade Separation Project was undertaken and the baseline against which future impacts are compared, and were used to determine through-traffic volumes at the Project Site's East Driveway Access, which is a shared driveway with the Rowland Heights Plaza/99 Ranch Market to the east. These traffic counts were used to determine the current turning movement volumes at shared driveway and

trip generation of the Rowland Heights Plaza/99 Ranch Market (since the Project Site was vacant at that time).

As shown in Table 1 in the Traffic Impact Assessment provided in Appendix I-1 of the Draft EIR, and repeated in Table 4.K-2 of Section 4.K, Transportation and Parking, of the Draft EIR, the Project East Access driveway/shared driveway with the Rowland Heights Plaza/Ranch 99 Market was determined to operate at an acceptable LOS during the peak periods in 2013, the baseline year. Since that time, as part of the Nogales Street Grade Separation Project improvements, this shared driveway has been widened to allow for increased vehicular capacity and a traffic signal has been installed at the intersection of the shared driveway and Gale Avenue and will remain at this location permanently. As shown in Table 6 of the Traffic Impact Assessment, under Future With Project Plus Cumulative Conditions, the (shared) Project East Access driveway is projected to continue to operate at an acceptable LOS following Project buildout during the peak periods.

Nonetheless, to address concerns expressed by the operator of Rowland Heights Plaza/99 Ranch Market, immediately east of the Project Site, about the future LOS at the intersection of the (shared) Project East Access driveway and Gale Avenue, the Project Applicant relocated the proposed ingress/egress driveway to subterranean parking beneath Building 4 to the west side of that building and away from the shared driveway during Project design development, and furthermore conducted driveway counts in September 2015 to determine the number of ingress and egress shared driveway trips during the same weekday A.M., P.M., and Saturday mid-day peak periods that were evaluated for the Draft EIR Traffic Impact Assessment. **Table 2-2, Rowland Heights Plaza/99 Ranch Market Shared Driveway Intersection Trip Generation, ICU and LOS at Project Buildout (2020)**, summarizes those counts. As shown therein, Rowland Heights Plaza/99 Ranch Market currently generates approximately 153 vehicles during the weekday A.M. peak hour, 513 vehicles during the weekday P.M. peak hour, and 888 vehicles during the Saturday mid-day peak hour. (Associated trip distribution was calculated using traffic count data collected at the driveways for the property, and was modified to assume current illegal turning movements would be required to observe legal turning movements in the future, to simulate conditions after the Project's proposed raised median is installed to prevent left turns into and out of the driveways.)

The proposed Project, following the minor modifications described previously in this Topical Response, is projected to generate approximately 539 vehicles per hour during the weekday morning peak hour, 843 vehicles per hour during the weekday evening peak hour, and 1,088 vehicles per hour during the Saturday mid-day peak hour, which would be spread among the three Project driveways. Table 2-2 indicates the additional increase in trips that would have to occur before unacceptable levels of service (LOSs E and F) are reached. As shown, the existing number of peak hour trips at the Rowland Heights Plaza Shopping Center/99 Ranch Market would have to increase by 53 percent to reach capacity and operate at LOS E and 70 percent to reach intersection utilization capacity (ICU) and operate at LOS F, respectively. Table 2-2 also shows intersection capacity utilization and LOSs projected for the shared driveway in 2020, assuming 53 percent and 70 percent increases in driveway counts. This increase is neither anticipated based on trip generation for those land uses nor technically possible because of limitations on the parking supply at Rowland Heights Plaza Shopping Center/99 Ranch Market, and therefore the shared driveway is not expected to reach capacity or operate at an unacceptable level of service following Project buildout.

Table 2-2

**Rowland Heights Plaza/99 Ranch Market Shared Driveway Intersection
Trip Generation, ICU and LOS at Project Buildout (2020)**

Level of Service	Growth Factor	Estimated Trip Generation								
		Weekday A.M. Peak Hour Trips			Weekday P.M. Peak Hour Trips			Saturday Mid-Day Peak Hour Trips		
		Morning			Evening					
		In	Out	Total	In	Out	Total	In	Out	Total
Existing	1.00	114	39	153	245	268	513	474	414	888
Required increase for LOS E	1.53	174	60	234	375	410	785	725	633	1,359
Required increase for LOS F	1.70	194	66	260	417	456	872	806	704	1,510
With 53% increase				0.484 (LOS A)			0.657 (LOS B)			0.901 (LOS E)
With 70% increase				0.498 (LOS A)			0.717 (LOS C)			1.001 (LOS F)

Source: Kunzman Associates, Inc., May 2016

6. MITIGATION MEASURES

As previously stated, several roadway improvements are currently ongoing in the Project study area which are expected to mitigate all intersections significantly impacted by the Project, with five exceptions: Intersections No. 1 (Fullerton Road & Gale Avenue), No. 3 (Fullerton Road & SR-60 Eastbound Ramps), No. 4 (Fullerton Road & Colima Road), No. 10 (Nogales Street & La Puente Road), and No. 18 (Nogales Street & Colima Road).

Mitigation Measure MM-TRAF-1, as stated in Section 4.K, Transportation and Parking, of the Draft EIR, proposed for the Project is as follows:

Mitigation Measure MM-TRAF-1, below, identifies the Project Applicant’s fair-share contributions toward the physical mitigation measures required to reduce impacts at two of the potentially significantly impacted intersections to a less than significant level:

MM-TRAF-1: The Project Applicant shall pay a fair-share contribution to LACDPW or the City of Industry, as appropriate, to implement the following physical improvements identified at two intersections that would be significantly impacted by the Project under Future (2020) With Project Plus Cumulative Traffic conditions:

- **Intersection No. 1 (Fullerton Road & Gale Avenue):** The Project Applicant shall coordinate with the City of Industry to arrange a fair-share contribution towards the construction of an additional westbound left-turn lane at this intersection. The fair-share contribution shall be made in accordance with Table 8, Project Fair Share Contributions, of the approved Rowland Heights Plaza Traffic Impact Analysis, which requires the Project Applicant to contribute 97.9 percent of the estimated City of Industry cost to implement this improvement.

- **Intersection No. 3 (Fullerton Road & SR-60 Freeway Eastbound Ramps):** The Project Applicant shall coordinate with LACDPW to arrange a fair-share contribution towards the construction of a northbound through travel lane at this intersection. The fair-share contribution shall be made in accordance with Table 8, Project Fair Share Contributions, of the approved Rowland Heights Plaza Traffic Impact Analysis, which requires the Project Applicant to contribute 81.1 percent of the estimated LACDPW cost to implement this improvement.

The first improvement may not be necessary as it may be superseded by the Fullerton Road Grade Separation Project. According to ACE,¹ commencement of the Fullerton Road Grade Separation Project is planned for Fall 2016 with completion anticipated between Fall 2018 and the end of 2018. The additional westbound left-turn lane will be completed as part of the Fullerton Road Grade Separation Project before this Proposed Project is open for business. The Project Applicant will coordinate with the City of Industry and the ACE Construction Authority to determine the necessity of the physical improvements required by mitigation measure MM-TRAF-1, in light of ACE Construction Authority's now-planned Gale Avenue underpass at this intersection as part of the Fullerton Road Grade Separation Project, and will confirm the timing of the planned improvement of this intersection and the need for Applicant-funded mitigation (a fair-share contribution of 97 percent of the estimated City of Industry cost of implementation), to ensure it is in place prior to the commencement of Project operation. Also as stated in the TIA and Section 4.K of the Draft EIR, the Project Applicant is required to make a fair-share contribution (81.1 percent of the estimated LACDPW cost of implementation) toward the construction of a northbound through-travel lane at Intersection No. 3 (Fullerton Road & SR-60 Freeway Eastbound Ramps). These mitigation measures would reduce anticipated Project impacts at these two intersections to less than significant levels.

The remaining three significantly impacted intersections are already fully built out (with the exception of Intersection No. 4, Fullerton Road & Colima Road, where a funded highway improvement project that would add a northbound exclusive right-turn lane to Fullerton Road is currently being administered by LACDPW) and no additional physical improvements are feasible at these locations. Impacts at these three intersections, therefore, cannot be mitigated to a less than significant level.

- **Intersection No. 4 (Fullerton Road & Colima Road)**
- **Intersection No. 10 (Nogales Street & La Puente Road)**
- **Intersection No. 18 (Nogales Street & Colima Road)**

As previously stated, these intersections currently operate at an acceptable LOS and are projected to continue to operate at an acceptable LOS with or without identified improvements.

Based on the required Project improvements as set forth in the TIA appendix and Section 4.K of the Draft EIR and other roadway improvements currently being constructed by ACE and the County, the remaining study area intersections are projected to operate at acceptable LOSs in the future, following Project implementation.

¹ *Communication with Maria Cano, Community Relations Specialist, Alameda Corridor East (ACE) Construction Authority, April 2016.*